

1 KRYSTA KAUBLE PACHMAN (280951)  
2 kpachman@susmangodfrey.com  
3 **SUSMAN GODFREY L.L.P.**  
4 1900 Avenue of the Stars, Suite 1400  
5 Los Angeles, California 90067-6029  
6 Telephone: (310) 789-3100

7 SHAWN J. RABIN (*pro hac vice*)  
8 srabin@susmangodfrey.com  
9 **SUSMAN GODFREY L.L.P.**  
10 One Manhattan West, 50<sup>th</sup> Floor  
11 New York, New York 10019  
12 Telephone: (212) 336-8830

13 (*Additional counsel on signature page*)

14 *Attorneys for Plaintiffs MEGAN TRAMA, MATTHEW HARTZ, and*  
15 *RAFAEL ROBLES*

16  
17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**  
19 **WESTERN DIVISION**  
20

21 MEGAN TRAMA, MATTHEW  
22 HARTZ, and RAFAEL ROBLES on  
23 behalf of themselves and all others  
24 similarly situated,

25 Plaintiffs,

26 v.

27 RELX INC.

28 Defendant.

Case No. 2:24-cv-3174-DSF (Ex)

Judicial Officer: Hon. Dale S. Fischer

**PLAINTIFFS' NOTICE OF  
MOTION AND UNOPPOSED  
MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT**

Date: November 3, 2025

Time: 1:30 p.m.

Courtroom: 7D

**TO THE COURT, ALL PARTIES, AND ALL COUNSEL OF RECORD:**

PLEASE TAKE NOTICE THAT on November 3, 2025 at 1:30 p.m., or as soon as this matter may be heard, Plaintiffs Megan Trama, Matthew Hartz, and Rafael Robles, on behalf of themselves and all others similarly situated (“Plaintiffs”), respectfully move this Court for preliminary approval of the settlement reached in this case, the terms of which Plaintiffs describe in the Memorandum of Points and Authority in support of this Motion. This Motion will be heard before the Honorable Dale S. Fischer of the above-named Court. The Court is located at the First Street Courthouse, 350 West 1st Street, Courtroom 7D, Los Angeles, California 90012.

Plaintiffs request that the Court enter the proposed Preliminary Approval Order and: (1) conditionally certify the Settlement Class (as defined in the settlement agreement) under Federal Rule of Civil Procedure 23(b)(2); (2) appoint Plaintiffs’ counsel as class counsel for purposes of the settlement; (3) preliminarily approve the settlement agreement; and (4) schedule a Final Approval Hearing.

This Motion is based on the Notice of Motion, the accompanying Memorandum of Points and Authorities, the Settlement Agreement (Ex. 1), the Declaration of Krysta Pachman (Ex. 2), the pleadings, records, and other filings in the case, and other such matters and argument as the Court may consider at the hearing of this Motion.

Pursuant to L.R. 7-3, this Motion is unopposed and is filed with the consent of counsel for Defendant RELX, Inc.

1 Dated: October 3, 2025

Respectfully submitted,

2 By: /s/ Krysta Kauble Pachman

3 Krysta Kauble Pachman

4 Krysta Kauble Pachman (280951)

5 kpachman@susmangodfrey.com

6 **SUSMAN GODFREY L.L.P.**

7 1900 Avenue of the Stars, Suite 1400

8 Los Angeles, California 90067-6029

9 Telephone: (310) 789-3100

Facsimile: (310) 789-3150

10 Shawn J. Rabin (*pro hac vice*)

11 srabin@susmangodfrey.com

12 **SUSMAN GODFREY L.L.P.**

13 One Manhattan West, 50th Floor

14 New York, New York 10001

15 Telephone: (212) 336-8830

16 Alejandra C. Salinas (*pro hac vice*)

17 asalinas@susmangodfrey.com

18 **SUSMAN GODFREY L.L.P.**

19 1000 Louisiana Street, Suite 5100

20 Houston, Texas 77002

21 Telephone: (713) 651-9366

22 Don Bivens (*pro hac vice*)

23 don@donbivens.com

24 **DON BIVENS, PLLC**

25 15169 N. Scottsdale Rd., Suite 205

26 Scottsdale, Arizona 85254

27 Telephone: (602) 708-1450

28 *Attorneys for Plaintiffs*

MEGAN TRAMA, MATTHEW HARTZ,  
and RAFAEL ROBLES